

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS****Manufactured Housing Section**

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Date: August 19, 2011

To: Manufactured Housing Manufacturers
HCD-Approved Third-Party Agencies

Subject: Alternate Approval (AA) 08092011 - Manufactured Housing Fire Sprinkler System (FSS)
Local Waterflow Alarms

Under the authority of California Health and Safety Code §18016, the Department of Housing and Community Development (HCD) issues this statewide alternate method of construction in order to exclude the requirement for local water flow alarm installations in FSS installed in manufactured homes and multi-family manufactured homes (MH/MFMH) constructed on or after September 16, 2002. Local waterflow alarms for FSS installed in MH/MFMH may be omitted under the following conditions:

- Smoke alarms must be installed in accordance with the applicable Federal Manufactured Construction and Safety Standards (MHCSS) Part 3280, §3280.208.
- FSS must be installed in accordance with the California Code of Regulations, Title 25, Article 2.5, Fire Sprinkler Systems.

Background

NFPA 13D §7.6 (Alarms) which California adopts by reference for residential occupancies – requires local waterflow alarms be provided on all FS systems in homes not equipped with smoke alarms or smoke detectors in accordance with NFPA 72, National Fire Alarm and Signaling Code. The preemptive federal requirements contained in MHCSS §3280.208, describes the manner for using smoke alarms in MH/MFMH but does not adopt NFPA 72 as the standard.

California Code of Regulations, Title 25 (T25 CCR) provides preemptive design and installation requirements for FSS systems installed in new or used MH/MFMH, which adopts by reference the provisions of NFPA 13D with exceptions. Specifically, T25 §4302(c) governs the design and installation requirements of FSS systems in MH/MFMH. However, it does not adopt the NFPA 13D provision in NFPA §4.6 (Smoke Alarm), which requires smoke alarms in accordance with NFPA 72.

Determination

Although both T25 CCR and the MHCSS do not specifically adopt the NFPA 72 standard, HCD determined that the standards and installation requirements for smoke alarms specified in §3280.208 of the MCHSS is equivalent to NFPA 72, and provides equivalent protection to NFPA 13D §7.6.

Please contact the Manufactured Housing Program at (916) 445-3338 if you have any questions or concerns regarding this blanket exemption letter.

Kim Strange
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